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17 Attorneys for Defendant
Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

21 Waymo LLC,
22 Plaintiff,
23
24 v.
25 Uber Technologies, Inc.; Ottomotto LLC; Otto
26 Trucking LLC,
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES P. HYDE IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS OPPOSITION TO
UBER'S MOTION TO COMPEL
INTERROGATORIES [DKT. NO. 1143]**

Courtroom: 8, 19th Floor
Judge: Hon. William Alsup
Trial Date: October 10, 2017

1 I, Hayes P. Hyde, declare as follows:

2 1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration
 3 based upon matters within my own personal knowledge and if called as a witness, I could and
 4 would competently testify to the matters set forth herein. I make this declaration in support of
 5 Plaintiff's Administrative Motion to File Under Seal Its Motion to Compel Text Messages [Dkt.
 6 No. 1143].

7 2. I have reviewed the following documents and confirmed that only the portions
 8 identified below merit sealing:

9 Document	10 Portions to Be Filed Under Seal
11 Exhibit 2	12 Entire document

13 3. Exhibit 2 contains highly confidential, sensitive business information relating to the
 14 terms of Otto Trucking's agreements and corporate structure. This information is not publicly
 15 known, and its confidentiality is strictly maintained. I understand that this information could be
 16 used by competitors to Otto Trucking's detriment, including in the context of negotiating business
 17 deals. If such information were made public, I understand Otto Trucking's competitive standing
 18 could be significantly harmed.

19 4. Defendant's request to seal is narrowly tailored to those portions of the Plaintiff's
 20 Motion and its supporting papers that merit sealing.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is
 22 true and correct. Executed this 10th day of August, 2017 in San Francisco, California.

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 24
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 27
 28
 /s/ Hayes P. Hyde
 Hayes P. Hyde

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on August 10, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 10th day of August 2017.

/s/ Hayes P. Hyde
Hayes P. Hyde